

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
EASTERN DIVISION**

ROBERT HOLMAN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 1:21-cv-01085-STA-jay
	)	
THOMAS J. VILSACK, in his official	)	
capacity as Secretary of the United States	)	
Department of Agriculture, and	)	
	)	
ZACH DUCHENEAUX, in his official	)	
capacity as Administrator of the Farm Service	)	
Agency,	)	
	)	
Defendants.	)	

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**DECLARATION OF BRADEN H. BOUCEK**

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1. The facts set forth in this declaration are based on my knowledge and, if called as a witness, I can competently testify to their truthfulness under oath.

2. I am over the age of 18, have personal knowledge of the facts set forth herein, and am competent to testify.

3. I make this declaration in support of the motion for attorney fees incurred in the successful representation in this matter before the United States District Court for the Western District of Tennessee.

4. I previously filed a declaration in support of the motion for attorney fees. (*See* Doc. 85-2 at PageID # 1306-1311.) It is incorporated here by reference.

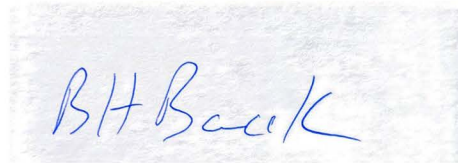
5. Since the time I filed the initial motion, I have accrued additional time reviewing the Defendants' response and preparing a reply.

6. All of the additional attorney time on behalf of SLF and for which Plaintiff is seeking fees is listed in Exhibit 1.

7. Exhibit 1 represents contemporaneous time sheets, computer files, and other contemporaneous documentation maintained in the regular course of business by SLF. It is the regular practice of the SLF to make and keep the types of records set forth in the attachment. These records have been in the custody supervision and control of SLF employees and accurately reflect the reasonable attorneys' fees that I have concluded in my professional judgment are appropriate for recover in this matter.

8. As Exhibit 1 indicates, SLF has accrued an additional **18.7 hours** since it filed the last declaration. When combined with the original request for 259.3 hours, the total is now **278 hours** of SLF's time.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct and that, if called upon to do so, I can competently testify of my personal knowledge of the matters stated herein.



Dated: October 20, 2022.

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BRADEN H. BOUCEK

# Billing Records of Southeastern Legal Foundation

Date	User	Duration/Quantity	Description
10/14/2022	Braden Boucek	0.5	Reviewing response to motion for attorney's fees and costs.
10/14/2022	Braden Boucek	0.2	Email exchange with Attorney Snow and Trachman regarding consent to file a reply.
10/14/2022	Braden Boucek	0.2	Preparing for a reply; researching attorney's fees and prevailing party.
10/14/2022	Braden Boucek	0.4	Drafting reply in support of motion for attorney fees and costs.
10/15/2022	Braden Boucek	6.2	Researching and drafting reply to motion for costs and attorney fees.
10/16/2022	Braden Boucek	4.4	Drafting and editing reply to motion for costs and attorney fees.
10/17/2022	Braden Boucek	2.1	Drafting and editing reply to motion for costs and attorney fees.
10/17/2022	Braden Boucek	0.1	Emailing Attorney Trachman with reply brief and comments.
10/18/2022	Braden Boucek	0.5	Drafting motion for leave to file reply and proposed order
10/18/2022	Braden Boucek	0.2	Drafting attorney affidavit in support of reply.
10/19/2022	Braden Boucek	2.4	Editing reply to motion for costs and attorney fees.
10/20/2022	Braden Boucek	1.5	Editing reply to motion for costs and attorney fees; reviewing billing records and attorney fee declarations.
TOTAL		18.7	

# Declaration of William Trachman

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
EASTERN DIVISION**

ROBERT HOLMAN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 1:21-cv-01085-STA-jay
	)	
THOMAS J. VILSACK, in his official	)	
capacity as Secretary of the United States	)	
Department of Agriculture, and	)	
	)	
ZACH DUCHENEAUX, in his official	)	
capacity as Administrator of the Farm Service	)	
Agency,	)	
	)	
Defendants.	)	

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**DECLARATION OF WILLIAM E. TRACHMAN**

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1. The facts set forth in this declaration are based on my knowledge and, if called as a witness, I can competently testify to their truthfulness under oath.
2. I am over the age of 18, have personal knowledge of the facts set forth herein, and am competent to testify.
3. I make this declaration in support of the motion for attorney fees incurred in the successful representation in this matter before the United States District Court for the Western District of Tennessee.
4. I previously filed a declaration in support of the motion for attorney fees. It is incorporated here by reference.
5. Since the time I filed the initial motion, I have accrued additional time reviewing the Defendants' response and preparing a reply.

6. All of the additional attorney time on behalf of SLF and for which Plaintiff is seeking fees is listed in Exhibit 1.

7. Exhibit 1 represents contemporaneous time sheets, computer files, and other contemporaneous documentation maintained in the regular course of business by Mountain States Legal Foundation (MSLF). It is the regular practice of the MSLF to make and keep the types of records set forth in the attachment. These records have been in the custody supervision and control of MSLF employees and accurately reflect the reasonable attorneys' fees that I have concluded in my professional judgment are appropriate for recover in this matter.

8. As Exhibit 1 indicates, MSLF has accrued an additional **4.1 hours**. When combined with the original request for 89.5 hours, the total is **93.6** of MSLF's time.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct and that, if called upon to do so, I can competently testify of my personal knowledge of the matters stated herein.

Dated: October 19, 2022.

/s William E. Trachman  
William E. Trachman

# Billing Records of Mountain States



Date	User	Duration/Quantity	Description
10/13/2022	William E. Trachman	0.8	Review pleadings re Holman opposition
10/14/2022	William E. Trachman	0.2	Review correspondence re reply in Holman
10/14/2022	William E. Trachman	0.7	Confer re Wynn and Holman
10/17/2022	William E. Trachman	0.5	Consider and review email re reply brief from Braden Boucek and potential cuts
10/18/2022	William E. Trachman	1.4	Review and revise reply brief in support of costs
10/18/2022	William E. Trachman	0.2	Review pleadings re reply brief in Holman, grant
10/19/2022	William E. Trachman	0.3	Revise and circulate declaration for fees in
Total		4.1	